

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

RICHARD BANKHEAD,)
)
Plaintiff,)
)
v.) CASE NO. 03:07CV208-MHT
)
AMERICAN SUZUKI MOTOR CORP.,)
)
Defendant.)
)

DEFENDANT'S RULE 26 PRE-TRIAL EXHIBIT LIST DISCLOSURE

Defendant American Suzuki Motor Corporation (“ASMC”) says as follows in support of its Rule 26 Pre-Trial Exhibit List Disclosure pursuant to the Court’s Uniform Scheduling Order:

I. **Trial Exhibits.** Pursuant to Section 11 of the Uniform Scheduling Order, and without waiving any objections as to admissibility, ASMC identifies the following exhibits that it expects to offer or that it may offer at trial if the need arises (except ASMC has not identified witnesses that may be called for impeachment purposes and it has not identified charts, graphs, time lines, and other demonstrative aids, which will be disclosed pursuant to the Court’s Pre Trial Order):

Exhibit Date #	Description	Bates #	Expects / May Offer
1.	Vehicle Master for JS1GR7KA862108568	Bankhead/Suzuki 002-005	E
2.	ASMC Invoice to Dealer for JS1GR7KA862108568	Bankhead/Suzuki 006	E
3.	Bill of Lading for JS1GR7KA862108568	Bankhead/Suzuki 007	E
4.	Certificate of Vehicle Pre-Delivery applicable to subject motorcycle	Bankhead/Suzuki 008	E
5.	On-Road Motorcycle Limited Warranty Policy applicable to subject motorcycle	Bankhead/Suzuki 009-019	E
6.	GSX-R750 Assembly and Pre-Delivery Service Guide	Bankhead/Suzuki 020-050	E
7.	Service Bulletin GSX-R No. 151 re Setup Manual Correction	Bankhead/Suzuki 051-052	M
8.	GSX-R750 Owner's Manual	Bankhead/Suzuki 053-185	E
9.	Post-accident Photographs of JS1GR7KA862108568		E
10.	Diagrams of GSX-R750 Wiring		E
11.	GSX-R750 Marketing Materials		M
12.	GSX-R750 Safety Materials		M

Exhibit Date #	Description	Bates #	Expects / May Offer
13.	Any document necessary for impeachment.		M
14.	Any document which may be discovered by ASMC after the date of these disclosures, whose identity will be furnished to opposing counsel immediately upon discovery of said document.		M
15.	Although ASMC does not concede the admissibility of any document proffered by Plaintiff, ASMC reserves the right to use any Exhibit listed by the Plaintiff.		M
16.	ASMC reserves the right to prepare demonstrative exhibits to aid the Court and jury, including charts or summaries evidencing information contained in the above-referenced exhibits.		M

Respectfully submitted this 4th day of September, 2008.

/s/ John D. Mayo

One of the Attorneys for Defendant
American Suzuki Motor Corp.

OF COUNSEL:

Jere F. White, Jr. (WHITJ1759)
S. Andrew Kelly (KELLS3760)
John D. Mayo (MAYOJ2469)
LIGHTFOOT, FRANKLIN & WHITE, L.L.C.

The Clark Building
400 North 20th Street
Birmingham, Alabama 35203-3200
(205) 581-0700
(205) 581-0799 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of September, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Zachary T. Collins, Esq.
207 Montgomery Street, Suite 215
Montgomery, Alabama 36104

Stewart S. Wilbanks, Esq.
1117 22nd Street South
Suite 206
Birmingham, Alabama 35205

/s/ John D. Mayo
Of Counsel